

EXHIBIT 10

From: [Liu, Mimi Y](#)
To: [WHJPMCSservice; DoeService@bsfllp.com](#)
Cc: [DL - Motley Rice JPMC Service; Wohlgemuth, Stephen; zwarren@wc.com](#)
Subject: RE: RE: M&C Agenda
Date: Monday, April 17, 2023 1:54:05 PM
Attachments: [image001.png](#)

EXTERNAL SENDER

Counsel,

USVI Agenda:

1. Priv Logs – see proposal sent today
2. Missing statements/payments/transactions (L Singer emails 4/6 and 4/14, also raised last few M&Cs)
3. 30b6 outstanding written response
4. HT Project – risk assessments
5. Langford production – complete?
6. Board Meetings – priv designation details?
7. Cutler – priv log
8. Revenues/holdings outside PB for Epstein (e.g. JPMAM, Bear Stearns)
9. Confirming we have distribution list documents, IMs
10. Responses to M Oliver letter April 10

Thank you.

Mimi



Mimi Liu Attorney at Law

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From: Liu, Mimi Y
Sent: Tuesday, April 11, 2023 11:13 AM
To: Boggs, Paige <pboggs@motleyrice.com>; WHJPMCSservice@wilmerhale.com;
DoeService@bsfllp.com
Cc: DL - Motley Rice JPMC Service <DL-MotleyRiceJPMCSservice@motleyrice.com>; Wohlgemuth, Stephen <SWohlgemuth@wc.com>; zwarren@wc.com
Subject: RE: RE: M&C Agenda

All – a few additions/details to our agenda in bold below.

Thanks.

Mimi

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From: Liu, Mimi Y

Sent: Monday, April 10, 2023 4:36 PM


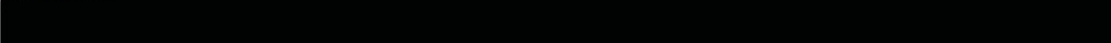
To: Boggs, Paige <pboggs@motleyrice.com>; WHJPMCSERVICE@wilmerhale.com;
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Subject: RE: RE: M&C Agenda

Counsel,

USVI Agenda:

1. Dimon Dep – length
2. Priv Logs – May 9 proposal; **also want to discuss priv log format and process for resolving challenges**
3. 
4. **Project JEEP documents and custodians, data surveillance from M Oliver letter Monday, April 10**
5. Confidentiality of Erdoes transcript/exhibits (and now Casey?)
6. Financial statements in email directly below and from L Singer email Friday, April 7
7. Priv docs ending in 5958 and 7200
8. Metadata
9. 30b6 written response – response to deficiency letter? (**impasse?**) Remaining written responses?
10. Regan Dep – new date
11. Human Trafficking Project – producing responsive docs, including risk assessments, ICE training, JPMC presentations (from Pearn dep)
12. SAC – what can be unredacted
13. **Project JEEP documents and custodians, data surveillance from M Oliver letter Monday, April 10**
14. 
15. **Response to Interrogatory 9**

Thanks.

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Sent: Tuesday, April 4, 2023 11:32 AM
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DoeService@bsfllp.com
Cc: DL - Motley Rice JPMC Service <DL-MotleyRiceJPMCSERVICE@motleyrice.com>; Wohlgemuth, Stephen <SWohlgemuth@wc.com>; zwarren@wc.com
Subject: RE: RE: M&C Agenda

One more item – we appear to be missing the following financial statements and ask that you search and produce – thanks.

Financial Trust, Inc	JPMC #Q30171005
Statement Dates	
10/31/2002	10/31/2005
2/28/2003	11/30/2005
3/31/2003	12/31/2005
4/30/2003	8/31/2006
8/31/2003	3/31/2008
10/31/2003	

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Sent: Monday, April 3, 2023 4:07 PM
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DoeService@bsfllp.com
Cc: DL - Motley Rice JPMC Service <DL-MotleyRiceJPMCSERVICE@motleyrice.com>; Wohlgemuth, Stephen <SWohlgemuth@wc.com>; zwarren@wc.com
Subject: RE: RE: M&C Agenda

USVI agenda for tomorrow:

1. Dimon – meet and confer re dep date and time
2. Dimon – calendar entries?
3. Confidentiality of Erdoes dep and exhibits
4. Response to 30(b)(6) deficiency letter
5. Timing of other 30(b)(6) written responses
6. Priv logs
7. Priv docs – per L Singer emails 3/24
8. Service for Steve Black or motion for alternate service
9. Metadata – JPMC to ask vendor?
10. Project JEEP
11. BOD risk committee materials – production date?

Thanks.

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From: Boggs, Paige <pboggs@motleyrice.com>

Sent: Monday, March 27, 2023 6:01 PM

To: Liu, Mimi Y <mliu@motleyrice.com>; WHJPMCSERVICE@wilmerhale.com; DoeService@bsfllp.com

Cc: DL - Motley Rice JPMC Service <DL-MotleyRiceJPMCSERVICE@motleyrice.com>

Subject: RE: RE: M&C Agenda

All,

Our agenda for tomorrow:

1. Status of Langford and Cutler document productions
2. 30(b)(6) topics not being covered on Wednesday
 1. Status of document productions re 30(b)(6) topics
 2. Written response re topics 2, 18, 23, and 28
 3. Topics 21 and 27
 4. Total time agreement
3. Dates for McCleerey and Reagan
4. Service for Steven Black – if not, motion for alternative service
5. Staley's personnel file
6. Documents relating to human trafficking
7. Relationship annual activity summaries – will any others be produced?
8. Dimon documents 2006-2011
9. Updates regarding the chronology and other attachments to JPM-SDNYLIT-0010094

10. Depo confidentiality designations
11. USVI's Motion to amend
12. Privilege docs/logs
 1. JPM-SDNYLIT-00157200
 2. JPM-SDNYLIT_00135958
 3. Logs as custodial or other productions are complete
13. [REDACTED]
14. Metadata – consistently not receiving the following:

Duplicate Custodian
DateModified
TimeModified
DateCreated
TimeCreated



Paige Boggs Attorney at Law

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From: Liu, Mimi Y <mliu@motleyrice.com>

Sent: Monday, March 20, 2023 4:52 PM

To: WHJPMCSERVICE@wilmerhale.com; DoeService@bsfllp.com

Cc: DL - Motley Rice JPMC Service <DL-MotleyRiceJPMCSERVICE@motleyrice.com>

Subject: RE: M&C Agenda

All,

Our agenda for tomorrow:

1. Proposed CMP sent Friday
2. Documents for Langford and Cutler depositions – Status of productions? Volume? [REDACTED]
[REDACTED]
3. Dimon deposition
4. Project Jeep: need explanation as to why it has been withheld
5. McCleerey – any dates week of April 24? (We have a conflict April 20.)
6. Regan dep – date? Separately represented?
7. Third party productions – do we have everything that JPMC has?
8. JPMC credit card statements
9. Missing canceled checks and wire information for Epstein's personal account ending in 0438.
10. Relationship annual activity summaries – only have 1-2 for Epstein – confirm no others?
11. Documents: Need chronology (and/or any other attachments) to any of emails in email chain at JPM-SDNYLIT-0010094; missing account statements

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From: Liu, Mimi Y

Sent: Tuesday, March 14, 2023 1:28 PM

To: WHJPMCSERVICE@wilmerhale.com; DoeService <DoeService@bsfilp.com>

Cc: DL - Motley Rice JPMC Service <DL-MotleyRice.JPMCSERVICE@motleyrice.com>

Subject: RE: M&C Agenda

All,

A few additional items to USVI agenda –

- Dimon dep notice – is JPMC producing and if so we need dates before mid-April.
- Missing canceled checks and wire information for Epstein's personal account ending in 0438.
- Relationship annual activity summaries – only have 1-2 for Epstein – confirm no others?

Thank you.

Mimi

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Sent: Monday, March 13, 2023 9:32 PM

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Subject: RE: M&C Agenda

Counsel,

Below is the agenda for the USVI portion of the call:

1. Confirm agreement on Erdoes Dep 8 hours b/w USVI and Doe Plaintiffs
2. Staley personnel/custodial files
3. Deposition date for McCleerey
4. Deposition protocol (need written protocol); cross-noticing; counting; [REDACTED]
[REDACTED] any zoom deps exhibit protocol
5. Priv re-review; Erdoes and Casey (see additional email)
6. Documents: Need chronology (and/or any other attachments) to any of emails in email chain at JPM-SDNYLIT-0010094; reproduce JPM SDNYLIT 00131994 (illegible); missing account statements
7. Schedule

8. [REDACTED]
 9. Production of third party documents subpoenaed by JPMorgan, as requested and required by Rule 45
 10. Meet and confer on Responses and Objs to USVI Second Set Discovery and USVI Third Set Rogs
 11. Status update and ETA regarding verified interrogatory responses and document productions relating to the 30(b)(6) topics
 12. Effective dates for policies and procedures
 13. JPMC credit card statements
- Thank you.

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From: Liu, Mimi Y
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Cc: DL - Motley Rice JPMC Service <DL-MotleyRiceJPMCSERVICE@motleyrice.com>
Subject: M&C Agenda

Counsel,

Below is the agenda for the USVI portion of the call:

1. Potential MTC issues - 30b6 issues (Topic 23 and 15); RFP 5; contacting court re MTC briefing schedule
2. 30b6 date (March 29)
3. Deposition scheduling (discuss confirmed dates + productions; need dates for DeLuca, Regan, McCleerey)
4. Deposition protocol (need written protocol); cross-noticing; counting; [REDACTED]
[REDACTED] any zoom deps exhibit protocol
5. Priv re-review; Erdoes and Casey (see additional email)
6. Overlay to determine families? Also need chronology (and/or any other attachments) to any of emails in email chain at JPM-SDNYLIT-00100941.
7. Responses and Objections to USVI second set discovery
8. Schedule – JPMC request to push back deadlines 4 weeks
9. USVI MTD hearing – [REDACTED]

Thank you.

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From: Liu, Mimi Y

Sent: Monday, February 27, 2023 3:40 PM

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Subject: M&C Agenda

Counsel,

Below is the agenda for the USVI portion of the call:

1. 30b6 issues, including 3 topics for M&C, deposition date, other issues raised in 2/26 email
2. Issues raised in USVI 2/24 response to 2/20 letter, including M&C items and response dates
3. [REDACTED] – requesting alternate service
4. Calling court after meeting to discuss impasse items, request discovery conference, [REDACTED] alternate service
5. Casey dep date, document production volume, confirming Casey/Erdoes doc prod'n by 3/3/23
6. Priv log re-review and new priv log for Casey/Erdoes (priority), setting M&C date
7. Search terms
8. D'allesio
9. OCC protective order addendum
10. Overlay to determine families

Thank you.

Mimi

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